

Honorable Thomas S. Zilly

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

GORDON SCOTT STROH,	)	
	)	No. 2:16-cv-00283 TSZ
Plaintiff,	)	
	)	STIPULATION AND ORDER
v.	)	REGARDING SEARCH TERMS
	)	
SATURNA CAPITAL CORPORATION;	)	
NICHOLAS KAISER; and JANE CARTEN,	)	
	)	
Defendants.	)	
	)	
	)	
	)	

Plaintiff Gordon Scott Stroh (“Plaintiff”) and Defendants Saturna Capital Corporation, Nicholas Kaiser, and Jane Carten (collectively, Defendants), by and through their undersigned counsel of record, hereby stipulate and agree that Defendants will apply the additional search terms listed below. Unless otherwise noted below, these search terms will be applied for previously agreed upon custodians.

**Search Terms**

- (Yacub OR Yaqub OR Mirza OR Safa OR saar OR “heritage education” OR “Islamic education” OR “CAIR” OR “holy land” OR HLF OR Al-Rajhi) AND (AML OR terrorist OR SEC OR FBI OR Homeland OR CTF OR raid! OR seiz! OR suspicious OR SAR OR SAR-SF OR compliance OR “red flag!” OR extremist OR raid OR warrant OR affidavit OR Qaeda OR Hamas)

STIPULATION AND ORDER REGARDING SEARCH TERMS  
(2:16-cv-00283-TSZ) — 1

DWT 31094197v1 0083307-000005

Davis Wright Tremaine LLP  
LAW OFFICES  
Suite 2200 · 1201 Third Avenue  
Seattle, Washington 98101-3045  
(206) 622-3150 · Fax: (206) 757-7700

- 1 • “Moeed Salam”
- 2 • “Moeed Abdul Salam”
- 3 • (Monem OR Moeed OR Salam) AND (terroris! OR extermis! OR Qaeda OR
- 4 investigat! OR violation OR U5 OR U-5)
- 5 • Limited to 11/1/11-3/31/12 for Kaiser, Carten and Stroh email: Monem AND
- 6 (SSB OR “Kuala Lumpur” OR KL OR deputy OR president OR relocate)
- 7 • Limited to communications from Monem to Kaiser or Carten: (Stroh OR
- 8 Compliance OR Legal OR Scott OR GSS)
- 9 • Limited to communications sent by Kaiser: AIMB or domini or (“merger
- 10 value”~50) OR (“acquisition value”~50)
- 11 • Limited to communications sent by Kaiser or Carten: Strike OR dilution OR
- 12 stiefel OR “10b-5” OR fraud OR “insider trading” OR “outside business” OR “OBA” OR
- 13 “minimum investment” OR (boilerplate AND trust)
- 14 • Limited to communications sent by Kaiser or Carten: “FBI” OR “NSA” OR
- 15 “CIA” OR examination OR examiner! OR regulat! OR violat! OR deficiency OR
- 16 enforcement OR (fail!~10 Supervise) OR (fiduciary~10 duty) OR (conflict ~10 interest) OR
- 17 legalese OR “4530”
- 18 • Limited to communications from “nkaiser@bloomberg.net,”
- 19 “nickkaiser@me.com,” “janecarten@mac.com” and messages sent from Kaiser or Carten cell
- 20 phones: Stroh OR Scott OR “gss” OR “CLO” OR “general counsel” OR legal OR compliance
- 21 OR “CCO”
- 22 • Limited to communications sent by Kaiser or Carten: Consigliere OR
- 23 whistleblow! OR tattletale! OR tattle-tale! OR spy OR spies

#### 24 **Specific Rules**

- 25 1. Search terms containing acronyms will be run in a manner to only pick up the
- 26 acronym, they will not be run to pick up words containing various combinations of the
- 27 acronym letters listed.

STIPULATION AND ORDER REGARDING SEARCH TERMS  
(2:16-cv-00283-TSZ) — 2

DWT 31094197v1 0083307-000005

Davis Wright Tremaine LLP  
LAW OFFICES  
Suite 2200 • 1201 Third Avenue  
Seattle, Washington 98101-3045  
(206) 622-3150 • Fax: (206) 757-7700

LANE POWELL PC

Christopher B. Wells, WSBA #08302  
1420 Fifth Avenue, Suite 4200  
Seattle, WA 98111-9402  
Telephone (206) 223-7000  
Facsimile: (206) 223-7107  
Email: wellsc@lanepowell.com

Davis Wright Tremaine LLP

Jeffrey B. Coopersmith, WSBA #30954  
Brendan Mangan, WSBA #17231  
Samantha Funk, WSBA #43341  
Max Hensley, WSBA #47030  
1201 Third Avenue, Suite 2200  
Seattle, WA 98101-3045  
Telephone: (206) 622-3150  
Fax: (206) 757-7700  
E-mail: [jeffcoopersmith@dwt.com](mailto:jeffcoopersmith@dwt.com)  
[brendanmangan@dwt.com](mailto:brendanmangan@dwt.com)  
[samanthafunk@dwt.com](mailto:samanthafunk@dwt.com)  
[maxhensley@dwt.com](mailto:maxhensley@dwt.com)

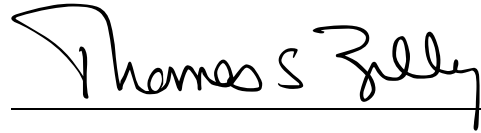
**Davis Wright Tremaine LLP**  
LAW OFFICES  
Suite 2200 • 1201 Third Avenue  
Seattle, Washington 98101-3045  
(206) 622-3150 • Fax: (206) 757-7700

**ORDER**

The parties' stipulation is APPROVED. The deferred portions of plaintiff's motions to compel, docket nos. 58 and 74, are STRICKEN as moot.

IT IS SO ORDERED.

DATED: January 17, 2017.

A handwritten signature in black ink that reads "Thomas S. Zilly". The signature is written in a cursive, flowing style. Below the signature is a horizontal line.

Thomas S. Zilly  
United States District Judge